

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Recommendations Approved by World	)	IB Dkt. No. 16-185
Radiocommunication Conference Advisory	)	
Committee	)	

**COMMENTS OF ECHOSTAR SATELLITE OPERATING CORPORATION AND DISH  
NETWORK CORPORATION**

EchoStar Satellite Operating Corporation (together with its affiliates, “EchoStar”) and DISH Network Corporation (together with its affiliates, “DISH”) submit these comments in support of the World Radiocommunication Conference Advisory Committee’s (“WAC”) recommendations on issues to be considered at the 2019 World Radiocommunication Conference (“WRC-19”) – specifically, the WAC recommendation to adopt a United States preliminary view for Agenda Item 9.1/Issue 9.1.1 supporting studies of technical and operational measures to ensure coexistence and compatibility between the terrestrial and satellite components of International Mobile Telecommunications in the 1980-2010 MHz and 2170-2200 MHz bands (collectively, the “S-band”).<sup>1</sup>

Both EchoStar and DISH have strong, vested interests in S-band operations. First, DISH is authorized to operate two S-band MSS satellites, D.1 and T.1, from the 92.85° W.L. and

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<sup>1</sup> See *International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee*, Public Notice, Attachment A, DA 17-1059 (Oct. 30, 2017).

111.0° W.L. orbital locations, respectively.<sup>2</sup> DISH further holds authorizations to provide both S-band MSS and terrestrial services (the AWS-4 frequencies at 2000-2020 MHz and 2180-2200 MHz) to the United States.<sup>3</sup>

In addition to the AWS-4 frequencies, other portions of the S-band have been allocated for terrestrial use in the United States. The spectrum at 1980-1990 MHz, in addition to other frequencies, has long been licensed and designated for large scale downlink (DL) terrestrial IMT operations.<sup>4</sup> In 2014, DISH paid \$1.56 billion to acquire, through an auction, the licenses for DL operation across all economic areas in 1995-2000 MHz (H Block).<sup>5</sup>

In addition, EchoStar is licensed to operate an integrated mobile satellite service network with a complementary ground component in the 1995-2010 MHz and 2185-2200 MHz bands throughout Europe, including the European Union.<sup>6</sup> Moreover, on June 7, 2017, EchoStar successfully launched EchoStar XXI, a state-of-the-art satellite licensed to provide mobile satellite services (“MSS”) in the 1995-2010 MHz and 2185-2200 MHz bands from the 10.25° E.L. orbital location.<sup>7</sup>

As licensed operators of S-band MSS and terrestrial networks in the United States and abroad, EchoStar and DISH have been working to ensure the most effective and efficient use of

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<sup>2</sup> See New DBSD Satellite Services G.P., IBFS File No. SAT-MOD-20070919-00129 (granted Apr. 2, 2008); Gamma Acquisition L.L.C., IBFS File No. SAT-MOD-20070529-00075 (granted Nov. 28, 2008).

<sup>3</sup> See *id.*; New DBSD Satellite Services G.P., FCC Radio Station Authorizations, Call Signs T070272001 *et al.* (granted Mar. 7, 2013); Gamma Acquisition L.L.C., FCC Radio Station Authorizations, Call Signs T060430001 *et al.* (granted Mar. 7, 2013).

<sup>4</sup> See Part 24 of the Commission’s rules, Personal Communications Services, 47 C.F.R. §§ 24.1 *et seq.*

<sup>5</sup> See FCC Public Notice, *Auction of H Block Licenses in the 1915-1920 MHz and 1995-2000 MHz Bands Closes, Winning Bidder Announced for Auction 96*, DA 14-279, Feb. 28, 2014.

<sup>6</sup> See EchoStar, *EchoStar XXI*, <https://www.echostar.com/launch.aspx#xxi> (last visited Nov. 9, 2017).

<sup>7</sup> See *id.*

the S-band. To this end, EchoStar and DISH both supported the ITU identifying this frequency band for both the satellite and terrestrial components of International Mobile Telecommunications (IMT). In order to further enable the most efficient use of the S-band and ensure both services can operate, EchoStar and DISH support adoption of the WAC preliminary view by the United States, supporting studies of technical and operational measures to ensure efficient S-band satellite and terrestrial operations in neighboring countries.

Respectfully submitted,

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